

From: [ANDERSON Jim M](#)  
To: [Kristine Koch/R10/USEPA/US@EPA](#); [Eric Blischke/R10/USEPA/US@EPA](#)  
Cc: [MCCLINCY Matt](#)  
Subject: RE: Table 5.1-2  
Date: 10/29/2008 08:56 AM

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Eric & Kristine,

One last question on Kristine's 10/29 edits below (look for my *blue italic text* at the end of "DEQ site specific comment #5).

Jim

-----Original Message-----

From: Koch.Kristine@epamail.epa.gov  
[<mailto:Koch.Kristine@epamail.epa.gov>]  
Sent: Wednesday, October 29, 2008 8:32 AM  
To: Blischke.Eric@epamail.epa.gov  
Cc: ANDERSON Jim M; MCCLINCY Matt  
Subject: RE: Table 5.1-2

Eric and Jim - Here are my final edits....If you are both ok with these, I'll clean it up and send to Lori Cora for final edit.

General #5 - I added some language to also include known upriver sources.

DEQ site-specific comment #1 - I agree except for KM Linnton - they had reported historical releases so they should be 'b'. Eric, the updates for the others were not made for all, so I changed to 'c'.

Comment #146 LOFTG - I just added some clarifying language.

DEQ site specific comment #5 - Eric, you modified the LWG recommendation rather than EPA/DEQ response. I fixed it. *Kristine, I think for edit is right, but you placed it in the "stormwater pathway". Shouldn't it be in the "overwater pathway"?*

(See attached file: Table5.1-2Comments102908KK.doc)

Kristine Koch

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Eric

Blischke/R10/USE

PA/US

To

"ANDERSON Jim

M"

10/28/2008 03:16

<ANDERSON.Jim@deq.state.or.us>

PM

cc

Kristine

Koch/R10/USEPA/US@EPA,

"MCCLINCY

Matt"

<MCCLINCY.Matt@deq.state.or.us>

Subject

RE: Table 5.1-2(Document

link:

Kristine

Koch)

I have made another run at this. A revised document is attached.

In response to Jim's comments:

General comment 1). I softened this language. I think the point here is to expand the sites we are looking at to reflect expanded study area boundaries. For example, no facilities in the Albina stormwater basin are included.

General Comment 2) I did not make a change. Please note the statement about some assessment of the potential for groundwater data. This would seem to cover the soil boring example you cite.

General Comment 3): Change made.

General Comment 4) I made most of these changes. However, note that we are repeating previous comments here and, sometimes, defining every acronym becomes cumbersome (e.g., DDX - give it a try). I corrected the two instances of overwater being spelled over water.

Specific Comment 1) Made change to c.

Specific Comment 2) Again, this is language from elsewhere (DEQ actually I believe). I tracked this one down and think we are referring to the qualifying statements regarding VOC and SVOC detections. I have changed the text to reflect this.

Specific Comment 3) Agreed with LWG to drop PCBs as a COI.

Specific Comment 4) Made the change per Jim's and Kristine's comments.

Specific Comment 5) I flagged this pathway as historical "c" and referred to the general comment.

With respect to Kristine's comments:

I made no change to the future source comment. I think we can just leave it open ended.

See my comment in the text regarding groundwater at ACF.

Regarding the overwater pathway at the BES water lab. The current table in the Round 2 report has the overwater pathway as H,c. I think we agree with this. I referenced our general comment on the overwater pathway. I am not 100% sure this matches up with what we want.

Regarding Freightliner - I understand that there is a TCE plume but what evidence do we have for NAPL?

Regarding splitting the Gunderson site, I think it is whether we look at the site as one or as three areas. I think we are all in agreement that we should look at the site as a whole.

Regarding the general comments, how about "General comments on revised presentation format"?

Regarding Schnitzer Kittridge - I made the change.

Regarding Triangle Park - I did not make any changes. The groundwater pathway remains "c" consistent with previous comments.

Please review regarding your previous changes/comments and make sure you are satisfied. If you are, I will perform some final edits and finalize.

Eric

[attachment "Table5.1-2Comments102808EB.doc" deleted by Kristine Koch/R10/USEPA/US]

"ANDERSON Jim  
M"

<ANDERSON.Jim@de

q.state.or.us>

To

Kristine

Koch/R10/USEPA/US@EPA,

10/28/2008 01:17

Eric Blischke/R10/USEPA/US@EPA

PM

cc

Eric

Blischke/R10/USEPA/US@EPA,

"MCCLINCY

Matt"

<MCCLINCY.Matt@deq.state.or.us>

Subject

RE: Table 5.1-

2

Eric & Kristine,

Yes, I agree..., I think we're very close to finalizing our comments, & I'd really get to get them done & not review this document again.

However, I still have several comments on both the General Comments & the Site-Specific Comments.

## General Comments

1) Revised Presentation Format- Bullet 5- DEQ does not agree with the statement "Since there may be many more sites that have had historical releases of significance or current sources that are unknown...." We believe we have identified & are addressing most all sites with historic significant releases, & that it is unlikely there are "many more" left.

We think the majority of these currently unidentified significant release sites &/or current sources are likely connected to the river via the stormwater pathway. One of DEQ's major source control focus identifying, evaluating & controlling the stormwater pathway. We agree with EPA's suggestion that the LWG should include both all upland sites immediate adjacent to the river in the Portland Harbor (PH) study area & sites in the PH drainage basin where there have been historic releases as part of the revised table. DEQ suggests the introductory phase "Since there may be many more sites....that are unknown," be dropped from EPA's comment.

2) Revised Presentation Format- Bullet 7- DEQ does not agree with EPA's comment stating "Sites without groundwater data and for which subsurface releases are possible should be designated as insufficient information, c". In some cases, I think we can reach a GW SCD without GW data based on the vertical extent of subsurface soil contamination. For instance if the water table is 15'bgs, but the historic, subsurface soil contamination only extends to <5'bgs, I don't think we need GW data to make that GW SCD. DEQ's concern can be addressed by starting EPA's cited text with the word "Generally,".

3) Revised Presentation Format- Bullet 3- In the parenthesized phrase in the last sentence of the comment, we suggest you change the "source" to "pathway".

4) Typos".- 1) spell all acronyms with their 1st use. 2) be consistent with the use of "over water" vs "overwater" in Bullet 3.

## Site-specific Comments

1) Comment 138 (Front Ave LP); Comment 145 (KM Linnton); Comment 151 (McCall Oil); Comment 157 (T4 ASA) & Comment 168 (NuStar)- Again, what is the basis for the historic overwater pathway to be classified as; “b” rather than “c”?

2) Comment 139 (Gasco)- It’s still unclear to DEQ what EPA means by

“footnotes”..., do you mean “LWG Recommendations”? If so, perhaps you should change the text to read: “The data review necessary for EPA & DEQ to concur with “LWG Recommendations” regarding the limited and/or specific VOC and SVOC chemicals detected was determined by EPA to be an unnecessary expenditure of resources at this time.”

3) Comment 143 (Gunderson)- DEQ agrees with EPA to drop PCBs as a GW COI, but that’s not what’s currently reflected in the text.

4) Comment 146 (LOFTG)- DEQ understands the LOFTG facility does not

front the river, so in that sense the riverbank erosion pathway should be “N/A”. Overland runoff &/or stormwater from LOFTG was likely transported offsite onto the neighboring BPA property, which does have river frontage. However, the riverbank & beach at the BPA property contains very low levels of COIs, so DEQ would classify riverbank erosion at BPA as” “d”.

5) Comment 158 T4, Slip 1)- For some reason the LWG is grouping overwater activities on the north side of Slip 3 (Kinder Morgan’s soda ash loading) as part of Slip 1. That said, I think EPA should default to your general comment on current overwater activities, rather than say current is “d”.

Thanks, & keep up the great work.

Jim Anderson

Manager, DEQ Portland Harbor Section

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-----Original Message-----

From: Koch.Kristine@epamail.epa.gov [  
<mailto:Koch.Kristine@epamail.epa.gov>]

Sent: Tuesday, October 28, 2008 8:50 AM

To: Blischke.Eric@epamail.epa.gov

Cc: ANDERSON Jim M; blischke.eric@epa.gov

Subject: Re: Table 5.1-2

Eric and Jim - Here are my edits/comments. I agree - we're getting closer.

(See attached file: Table5.1-2Comments102808KK.doc)

Kristine Koch



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Eric

Blischke/R10/USE

PA/US

To

Kristine Koch/R10/USEPA/US@EPA

10/27/2008 02:29

cc

PM

ANDERSON.Jim@deq.state.or.us,

blischke.eric@epa.gov

Subject

Re: Table 5.1-2(Document link:

Kristine Koch)

Ok - I took another cut at this - editing some of Kristines general comments, incorporating some of Jim's comments and adding some of my own thoughts. Here is yet another version. It's tedious to go

through this I know but I believe we are getting close.

Eric

[attachment "Table5.1-2Comments102708EB.doc" deleted by Kristine Koch/R10/USEPA/US]

Kristine

Koch/R10/USEPA/U

S

To

blischke.eric@epa.gov,

10/24/2008 01:39

ANDERSON.Jim@deq.state.or.us

PM

cc

Subject

Table 5.1-2

Eric and Jim - I have pulled together both of your sets of comments and my own. Please review this and see if you agree. I highlighted a couple I was not sure if they were correct, but you should really look them all over and be sure that we are all in agreement with the statements.

[attachment "kochComments to LWG\_Response to EPA comments on Table 5.1-2.doc" deleted by Eric Blischke/R10/USEPA/US]

Kristine Koch

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